

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**23-20215-CR-MORENO/GOODMAN**  
CASE NO.

18 U.S.C. § 922(g)(1)  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 924(c)(1)(A)(i)  
21 U.S.C. § 853  
18 U.S.C. § 924(d)

UNITED STATES OF AMERICA,

vs.

TAVORIS SHAYON HABERSHAM,  
Defendant.

FILED BY dgay D.C.

**May 23, 2023**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MIA

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**Possession of a Firearm and Ammunition by a Convicted Felon**  
(18 U.S.C. § 922(g)(1))

On or about January 14, 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**TAVORIS SHAYON HABERSHAM,**

did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

Said firearm and ammunition are:

- a. One (1) Taurus 9mm pistol, bearing serial number TDP27362; and
- b. Approximately seventeen (17) rounds of .9mm caliber ammunition.

**COUNT 2**

**Possession with Intent to Distribute a Controlled Substance  
(21 U.S.C. § 841(a)(1))**

On or about January 14, 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**TAVORIS SHAYON HABERSHAM,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a detectable amount of 3,4-Methylenedioxymethamphetamine, commonly known as “MDMA,” a Schedule I controlled substance.

**COUNT 3**

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime  
(18 U.S.C. § 924(c)(1)(A)(i))**

On or about January 14, 2023, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**TAVORIS SHAYON HABERSHAM,**

did knowingly use and carry a firearm during and in relation to a drug trafficking crime, and did knowingly possess a firearm in furtherance of a drug trafficking crime, a felony offense for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

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**FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **TAVORIS SHAYON HABERSHAM**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Sections 922(g)(1) or 924(c), or any other criminal law of the United States, as alleged in this Indictment, the defendant shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

3. Upon conviction of a violation of Title 21, United States Code, Section 841(a)(1), as alleged in this Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, pursuant to Title 21, United States Code, Section 853.

All pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 924(d)(1), and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
MARKENZY LAPONTE  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
JEREMY THOMPSON  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**UNITED STATES OF AMERICA**

**CASE NO.:** 23-20215-CR-MORENO/GOODMAN

V.

TAVORIS SHAYON HABERSHAM

**CERTIFICATE OF TRIAL ATTORNEY**

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Defendant

**Court Division (select one)**

**Superseding Case Information:**

New Defendant(s) (Yes or No) No

### Number of New Defendants

Total number of counts \_\_\_\_\_

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
- Interpreter: (Yes or No) No  
List language and/or dialect: \_\_\_\_\_
- This case will take 2 days for the parties to try.
- Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)  
I  0 to 5 days  Petty  
II  6 to 10 days  Minor  
III  11 to 20 days  Misdemeanor  
IV  21 to 60 days  Felony  
V  61 days and over
- Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
- Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No. \_\_\_\_\_
- Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
- Defendant(s) in federal custody as of \_\_\_\_\_
- Defendant(s) in state custody as of January 14, 2023
- Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
- Is this a potential death penalty case? (Yes or No) No
- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
- Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By:

✓/12

Jeremy Thompson  
Assistant United States Attorney  
FL Bar No. 0125140

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TAVORIS SHAYON HABERSHAM

Case No: \_\_\_\_\_

Count #: 1

Possession of a Firearm and Ammunition by a Convicted Felon

Title 18, United States Code, Section 922(g)(1)

\* **Max. Term of Imprisonment:** Fifteen (15) years' imprisonment

\* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

\* **Max. Supervised Release:** Three (3) years

\* **Max Fine:** \$250,000

Count #: 2

Possession with Intent to Distribute a Controlled Substance

Title 21, United States Code, Section 841(a)(1)

\* **Max. Term of Imprisonment:** Twenty (20) years' imprisonment

\* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

\* **Supervised Release:** Three (3) years min to Life

\* **Max Fine:** \$1,000,000

Count #: 3

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

Title 18, United States Code, Section 924(c)(1)(A)(i)

\* **Max. Term of Imprisonment:** Life Imprisonment

\* **Mandatory Min. Term of Imprisonment (if applicable):** Five (5) years

\* **Max. Supervised Release:** Five (5) years

\* **Max Fine:** \$250,000

\*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.